IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143 Honorable T.S. Ellis, III

Hearing: June 11, 2021

MOTION TO SEAL PORTIONS OF DEFENDANT'S OPPOSITION TO GOVERNMENT'S MOTION TO EXCLUDE EVIDENCE AT TRIAL AND CONSENT TO GOVERNMENT'S MOTION TO CONTINUE TRIAL

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting portions of his Opposition to Government's Motion to Exclude Evidence at Trial and Consent to Government's Motion to Continue Trial be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS By Counsel

Respectfully submitted,

/s/

Nina J. Ginsberg (#19472) Zachary Deubler (#90669) DiMuroGinsberg, P.C. 1101 King Street, Suite 610 Alexandria, VA 22314 Telephone: (703) 684-4333

Facsimile: (703) 548-3181 Email: nginsberg@dimuro.com Email: zdeubler@dimuro.com Jonathan Jeffress (#42884)

Jade Chong-Smith (admitted *pro hac vice*)

KaiserDillon PLLC

1099 Fourteenth St., N.W.; 8th Floor—West

Washington, D.C. 20005 Telephone: (202) 683-6150 Facsimile: (202) 280-1034

Email: jjeffress@kaiserdillon.com Email: jchong-smith@kaiserdillon.com

Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June, 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/______Nina Ginsberg